

Mooney Law  
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Invoice submitted to:

Keith & Jesse Hench

April 30, 2024

Bankruptcy Matter

Acct. No.: 16548-24

Professional Services:

			<u>Hours</u>	<u>Amount</u>
5/18/2023	Wendy Buterbaugh	Opening of client file which is to include Needles file; Best Case file; PACER search; pulling of required documents; preparing packet to send to client to begin work.	0.50	67.50
	Wendy Buterbaugh	Email clients with all documents again to proceed with putting their petition together.	0.20	27.00
5/19/2023	Wendy Buterbaugh	Left a voice mail for clients that all documents have been resent and provided deadline dates to complete things.	0.10	13.50
5/24/2023	Wendy Buterbaugh	Email to clients checking on status of work.	0.10	13.50
5/30/2023	Wendy Buterbaugh	Voice mail from client in need of document for credit counseling course.	0.10	13.50
	Wendy Buterbaugh	Email to clients providing instructions again for the credit counseling course.	0.10	13.50
5/31/2023	Wendy Buterbaugh	Telephone conference with client again stating the urgency to meet deadlines due to upcoming Sheriff sale.	0.20	27.00
6/1/2023	Wendy Buterbaugh	Received and reviewed documents from client that were in disarray. Sort through all to determine what was needed.	0.50	67.50
6/2/2023	Wendy Buterbaugh	Preparation of petition.	1.00	135.00
6/4/2023	Nicholas Platt	Review petition in preparation for petition review.	0.50	137.50
6/5/2023	Nicholas Platt	Travel to and from Carlisle location for petition review with both clients.	2.50	687.50

			<u>Hours</u>	<u>Amount</u>
6/5/2023	Wendy Buterbaugh	Preparation and filing of case.	0.20	27.00
	Wendy Buterbaugh	Email to clients providing their case number, plan information and requesting payroll information from them for the wage garnishment.	0.20	27.00
6/6/2023	Wendy Buterbaugh	Telephone conference with client as vehicle was repossessed.	0.20	27.00
	Wendy Buterbaugh	Telephone conference with auto lender in regarding to the repossession of vehicle of timing of the filing of the case. Had to hold for a significant length of time.	0.60	81.00
	Wendy Buterbaugh	Correspondence faxed to GM Financial with Notice of Bankruptcy Filing.	0.40	60.00
	Wendy Buterbaugh	Email to clients providing information regarding the Trustee meeting.	0.20	27.00
	Wendy Buterbaugh	Telephone conference with Cumberland County regarding the upcoming Sheriff sale on clients home.	0.20	27.00
	Wendy Buterbaugh	Telephone conference with client regarding the vehicle repossession and wanting to know when they can have it back. Advised it is being worked on.	0.20	27.00
	Nicholas Platt	Email from GM Financial to Attorney Platt regarding the vehicle and information on pick up.	0.10	27.50
	Wendy Buterbaugh	Telephone conference with clients with an update on vehicle and advised email to follow with instructions for pick up.	0.10	13.50
	Wendy Buterbaugh	Email to clients with phone number and location for vehicle pick up.	0.10	13.50
	Wendy Buterbaugh	Telephone conference with opposing counsel for mortgage lender regarding the Sheriff sale. They are working on having it terminated.	0.20	27.00
	Wendy Buterbaugh	Email from clients stating funds are being demanded for vehicle pick up and our response that with it will be looked into.	0.20	27.00

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6/6/2023	Wendy Buterbaugh	Telephone conference with loss prevention with GM Financial on fees being requested for vehicle pick up. Contact will be made to correct the issue. They called back to advise they corrected things.	0.20	27.00
	Wendy Buterbaugh	Voice mail to clients that they can pick up their vehicle and there will be no fees charged.	0.10	13.50
	Wendy Buterbaugh	Telephone conference with GM Financial. They called to advise that our clients can pick up the vehicle with no fees being charged.	0.20	27.00
6/8/2023	Wendy Buterbaugh	Preparation of Motion for Order to Pay Trustee.	0.30	40.50
	Nicholas Platt	Review Motion for Order to Pay Trustee and approve.	0.10	27.50
	Wendy Buterbaugh	File Motion for Order to Pay Trustee along with email copies to clients and employer.	0.30	40.50
6/9/2023	Wendy Buterbaugh	Received and reviewed Order approving Motion for Order to Pay Trustee. Emailed copies to clients and employer.	0.10	13.50
6/12/2023	Wendy Buterbaugh	Email from clients employer with new contact information.	0.10	13.50
	Wendy Buterbaugh	Received and reviewed Entry of Appearance filed by counsel for mortgage lender.	0.10	13.50
6/22/2023	Wendy Buterbaugh	Received and reviewed Request for Notices from counsel for auto lender.	0.10	13.50
7/3/2023	Wendy Buterbaugh	Email to clients regarding Trustee meeting.	0.10	13.50
7/6/2023	Nicholas Platt	Attended Trustee meeting. Travel to and from Carlisle location to do hearing in person with clients.	1.00	275.00
7/12/2023	Wendy Buterbaugh	Received and reviewed Objection by Trustee.	0.10	13.50
7/14/2023	Nicholas Platt	Review of case to include filed objections and claims filed.	0.50	137.50
7/21/2023	Wendy Buterbaugh	Left voice mail for clients regarding Pre-Confirmation Certificates.	0.10	13.50

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7/24/2023	Wendy Buterbaugh	Telephone conference with clients to review Pre-Confirmation Certificates with them and obtain approval for filing.	0.20	27.00
	Wendy Buterbaugh	Prepared and filed Pre-Confirmation Certificates.	0.10	13.50
7/31/2023	Wendy Buterbaugh	Received and reviewed Request for Notices and Objection to Plan filed by GM Financial.	0.10	13.50
8/3/2023	Nicholas Platt	Review of case with any new claims filed and most recent Objection to Plan filed.	0.20	55.00
8/4/2023	Wendy Buterbaugh	Email to clients requesting co-debtor pay stubs and also provide clients with mandatory second course information.	0.20	27.00
	Wendy Buterbaugh	Received and reviewed Objection to Plan by LoanDepot.	0.10	13.50
8/8/2023	Wendy Buterbaugh	Telephone conference with clients regarding surgery and pay stubs.	0.20	27.00
8/9/2023	Wendy Buterbaugh	Preparation of Objection to Claim.	0.40	54.00
	Nicholas Platt	Review Objection to Claim and approve for filing.	0.10	27.50
	Wendy Buterbaugh	File Objection to Claim and mail to appropriate parties.	0.30	40.50
8/14/2023	Wendy Buterbaugh	Email from counsel for mortgage lender and response regarding upcoming hearing and Objection filed.	0.30	40.50
8/15/2023	Nicholas Platt	Email from Attorney Platt to Attorney Roeder and his response regarding upcoming hearing.	0.20	55.00
9/8/2023	Nicholas Platt	Review of case and prepare the amended plan.	0.60	165.00
	Wendy Buterbaugh	Attempted to call both clients. Once cannot leave a message for, the other left a voice mail.	0.20	27.00
9/12/2023	Wendy Buterbaugh	Client returned call provided updates to medical issues and job search.	0.20	27.00
9/13/2023	Wendy Buterbaugh	Received and reviewed Order sustaining Objection to Claim.	0.10	13.50

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9/26/2023	Wendy Buterbaugh	Voice mail to client for update on employment.	0.10	13.50
	Wendy Buterbaugh	Email to clients for update on employment.	0.10	13.50
9/27/2023	Wendy Buterbaugh	Telephone conference with client and received update on employment.	0.20	27.00
9/29/2023	Wendy Buterbaugh	Email from client giving an update on new job and response requesting information.	0.20	27.00
	Wendy Buterbaugh	Email to client regarding living expenses and amended plan.	0.10	13.50
10/2/2023	Wendy Buterbaugh	Left voice mail for client regarding expenses and plan.	0.10	13.50
10/5/2023	Wendy Buterbaugh	Preparation of updating Schedules I and J with information provided by clients.	0.20	27.00
10/17/2023	Nicholas Platt	Review of case with new income and expenses and made updates to amended plan.	0.30	82.50
	Wendy Buterbaugh	Email to clients with copy of amended plan for approval.	0.10	13.50
10/18/2023	Wendy Buterbaugh	Telephone conference with Debtor regarding amended plan. He requested an email be sent again for Co-debtor.	0.20	27.00
	Wendy Buterbaugh	Email to clients regarding the amended plan and an explanation of the plan payment.	0.20	27.00
10/19/2023	Wendy Buterbaugh	Attempted to contact debtor regarding approval for the amended plan but mailbox was full. Left voice mail for co-debtor.	0.20	27.00
10/23/2023	Wendy Buterbaugh	Attempted to contact debtor regarding approval for the amended plan but mailbox was full. Left voice mail for co-debtor.	0.20	27.00
	Wendy Buterbaugh	Email to clients regarding the amended plan and needing an answer.	0.20	27.00
10/24/2023	Wendy Buterbaugh	Attempted to contact debtor regarding approval for the amended plan but mailbox was full. Left voice mail for co-debtor.	0.20	27.00

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10/24/2023	Wendy Buterbaugh	Urgent email to clients needing a response on amended plan.	0.20	27.00
10/26/2023	Wendy Buterbaugh	Correspondence to client regarding amended plan and no contact with clients.	0.40	55.50
10/30/2023	Wendy Buterbaugh	Attempt to contact debtor, voice mail full. Left voice mail with co-debtor.	0.20	27.00
	Wendy Buterbaugh	Email to clients regarding the amended plan.	0.20	27.00
	Wendy Buterbaugh	Telephone conference with debtor regarding the amended plan and wanting to discuss it with Attorney Platt.	0.40	54.00
11/2/2023	Nicholas Platt	Telephone conference with clients and Attorney Platt regarding the amended plan. Debtor provided updates to income; job situation; electric shut off.	0.50	137.50
11/3/2023	Wendy Buterbaugh	Received and reviewed pay stubs for debtor and debtor stated co-debtor will email hers. Updated Schedule I.	0.30	40.50
11/7/2023	Wendy Buterbaugh	Left voice mail regarding co-debtor pay stubs.	0.10	13.50
	Wendy Buterbaugh	Email to clients regarding co-debtor pay stubs.	0.20	27.00
11/8/2023	Wendy Buterbaugh	Email to clients regarding co-debtor pay stubs.	0.20	27.00
11/9/2023	Wendy Buterbaugh	Email to clients again regarding co-debtor pay stubs.	0.20	27.00
11/14/2023	Wendy Buterbaugh	Voice mail to clients regarding co-debtor pay stubs and a return call from co-debtor stating she would try to retrieve them for us.	0.20	27.00
	Wendy Buterbaugh	Client came to office to request help pulling co-debtor pay stubs from her employee portal.	0.10	13.50
	Wendy Buterbaugh	Received and reviewed Motion to Dismiss by Trustee. Provided a copy to clients.	0.20	27.00
11/15/2023	Wendy Buterbaugh	Received and reviewed information dropped off by client in regards to electric being shut off.	0.10	13.50

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11/16/2023	Wendy Buterbaugh	Received and reviewed pay stubs for co-debtor and updated Schedule I.	0.30	40.50
	Wendy Buterbaugh	Correspondence sent to electric company in regards to turn off notice and copy to clients.	0.40	60.00
11/17/2023	Nicholas Platt	Attorney review of case with all updated income. Due to co-debtor going back to work, request of updated expenses to make certain they are still accurate.	0.20	55.00
	Wendy Buterbaugh	Email to clients to review expenses to make sure they are still accurate.	0.10	13.50
11/20/2023	Wendy Buterbaugh	Telephone conference with client regarding expenses and any changes.	0.20	27.00
11/30/2023	Wendy Buterbaugh	Email to clients regarding household maintenance expense and receipts with client response.	0.20	27.00
12/1/2023	Nicholas Platt	Attorney review with all updated information final. Amended plan prepared and ready for client approval.	0.30	82.50
12/6/2023	Wendy Buterbaugh	Email to clients with amended plan for approval.	0.10	13.50
	Wendy Buterbaugh	Left a voice mail for co-debtor regarding amendment.	0.10	13.50
12/8/2023	Wendy Buterbaugh	Telephone conference with debtor and he stated they would review the plan and let us know how they would like to proceed.	0.20	27.00
12/11/2023	Wendy Buterbaugh	Attempted to contact debtor regarding approval for the amended plan but mailbox was full. Left voice mail for co-debtor.	0.10	13.50
12/12/2023	Wendy Buterbaugh	Email to clients regarding the amended plan that is due.	0.10	13.50
12/13/2023	Nicholas Platt	Email to Attorney Roeder regarding docket.	0.10	27.50
12/14/2023	Wendy Buterbaugh	Attempted contacting clients again, voice mail box full for debtor and left voice mail for co-debtor.	0.20	27.00
12/19/2023	Wendy Buterbaugh	Email from client denying approval to file amended plan.	0.10	13.50

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12/19/2023	Wendy Buterbaugh	Attempted to contact debtor regarding approval for the amended plan but mailbox was full. Left voice mail for co-debtor.	0.20	27.00
	Wendy Buterbaugh	Email to clients advising if plan is not filed, case will be dismissed by the Court.	0.20	27.00
	Nicholas Platt	Telephone conference with Attorney Platt and debtor regarding the case and not moving forward.	0.50	137.50
12/20/2023	Wendy Buterbaugh	Prepared and faxed correspondence to employer to terminate wage garnishment.	0.40	60.00
	Wendy Buterbaugh	Closing letter to client with copy of Order dismissing case.	0.40	55.50
12/21/2023	Wendy Buterbaugh	Voice mail from client and returned call to clients. Had to leave a voice mail for them.	0.10	13.50
Total Professional Service Charges:			<u>26.20</u>	<u>\$4,636.00</u>
Balance due				<u><u>\$4,636.00</u></u>